

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Civil Action

Plaintiff,

No. 2:22-cv-547

vs.

Judge Horan

MICHAEL RUSSIN, RUSSIN FINANCIAL,
RUSSIN GROUP, SIMON ARIAS, III,
ARIAS AGENCIES, S.A. ARIAS HOLDINGS, LLC,
AMERICAN INCOME LIFE INSURANCE
COMPANY,

Defendants.

JURY TRIAL DEMANDED

MOTION TO EXTEND DISCOVERY DEADLINE

AND NOW, comes the Plaintiff, Renee Zinsky, by and through undersigned counsel and requests the Court extend the discovery deadline in this case and avers as follows:

1. Pursuant to this Court's Order of September 7, 2022 discovery is scheduled to close February 28, 2023. [Doc. No. 44.]
2. The parties have diligently conducted discovery but are unable to complete discovery by the Court deadline.
3. Additional discovery in the form of depositions and/or third-party subpoenas is necessary to properly complete discovery in this matter.
4. For example, third party subpoenas are necessary to authenticate certain documents and information as well as clarify conflicting representations by Russin.

5. In addition, Plaintiff's counsel has reached out to counsel for Arias Agencies on multiple occasions in an attempt to schedule the deposition of a key witness, Natalie D'Achilles. To date, Ms. D'Achilles' availability has not been provided.

6. Therefore, plaintiff's counsel is requesting a 45-day extension in order to complete discovery in this matter.

7. Defense counsel does not consent to an extension of discovery in this matter.

8. No party will be prejudice by the extension of the discovery deadline.

WHEREFORE, Plaintiff's counsel respectfully requests this Court grant a 45-day extension to complete discovery in this matter.

Respectfully submitted,

/s/ Amy N. Williamson

Amy N. Williamson, Esq.

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CERTIFICATE OF SERVICE

I hereby certify on this 21st day of February, 2023 I electronically served a copy of the foregoing **Motion to Extend Discovery Deadline** via the CM/ECF system which will send notification of such filing.

/s/ Amy N. Williamson
Amy N. Williamson, Esq.